

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF TENNESSEE  
EASTERN DIVISION

DR. HARRY PEELER,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CA No.: 1:11-cv-01326-JDB-egb
	)	
BRITISH MEDICAL TRUST	)	
COMPANY LTD., PAUL FREEMAN,	)	
RYAN FERREIRA, GLOBAL	)	
BIOHEALTH SOLUTIONS, LTD.,	)	
DANIEL BARTLETT, BETH M.	)	
FREEMAN and CARLY FREEMAN,	)	
	)	
Defendants.	)	
_____	)	

**PLAINTIFF'S STATUS REPORT TO THE  
COURT REGARDING SERVICE OF PROCESS**

Dr. Harry Peeler, by and through counsel, hereby notifies the Court of his efforts to effectuate service pursuant to Rules 4(f)(2)(A) and 4(h)(2) in accordance with the Court's Order dated March 13, 2012. (Docket 8.) All defendants reside out of the country. Peeler's attempts to accomplish service are outlined as follows:

1. Peeler filed this action on October 24, 2011 against seven defendants for damages relating to multiple violations of statutes governing the sales of securities.

2. Upon information and belief, all of the defendant-entities are companies operating under the laws of the country of Mauritius.

3. Upon information and belief, the defendant-individuals are all domiciled overseas.

4. On October 31, 2011, this Court issued apostilles for summonses, marked #1:11-AP-01 ED through #1:11-AP-07 ED, and mailed them via first-class mail to Plaintiff's attorneys in Charleston, South Carolina. (Docket 5.)

5. In November, Plaintiff's attorney secured a Mauritius attorney to assist in effectuating service on all of the defendants.

6. On November 9, 2011, Plaintiff's attorney delivered the apostilles, along with the corresponding summonses and complaints via Federal Express to Mauritius counsel, Dev Erriah.

7. Mr. Erriah acknowledged receipt of the apostilles, summonses and complaints on November 14, 2011.

8. Thereafter, Mr. Erriah attempted to locate and serve these defendants. He indicated that the registered offices for the defendant-entities are closed, and registered agents cannot be located.

9. Mr. Erriah attempted personal service twice, and received two affidavits of non-service, one dated December 26, 2012 and one dated January 27, 2012.

10. Mr. Erriah notified us that he accomplished service on all of these defendants through publication, in accordance with Mauritius law.

11. Plaintiff received an affidavit of service from Mr. Erriah today, which was filed with the court at Docket 9.

12. Plaintiff will file with the court a motion for entry of default within the week and a separate motion for a preliminary injunction.

WHEREFORE, Peeler hereby notifies the Court that he has accomplished service on these foreign defendants in accordance with Fed. R. Civ. P. 4(f)(2)(A) and 4(h)(2).

Respectfully submitted,

/s/ Lindsey W. Cooper Jr.

LINDSEY W. COOPER JR.

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*Counsel to Dr. Harry Peeler*

Dated: June 11, 2012  
Charleston, South Carolina

**CERTIFICATE OF SERVICE**

It is hereby certified that on June 11, 2012, I caused the foregoing  
PLAINTIFF'S STATUS REPORT to be served on the Defendants via first-  
class international mail to the following addresses:

Carly Freeman  
51 Ebene, Cybercity, Reduit  
Republic of Mauritius

Ryan Ferreira  
1st Floor Block B Ruisseau Creole  
Black River  
Republic of Mauritius

Daniel Bartlett  
51 Ebene, Cybercity, Reduit  
Republic of Mauritius

Paul Freeman  
1st Floor Block B Ruisseau Creole  
Black River  
Republic of Mauritius

Beth M. Freeman  
51 Ebene, Cybercity, Reduit  
Republic of Mauritius

British Medical Trust Co., Ltd.  
1st Floor Block B Ruisseau Creole  
Black River  
Republic of Mauritius

Global Biohealth Solutions, Ltd.  
51 Ebene, Cybercity, Reduit  
Republic of Mauritius

/s/ Lindsey W. Cooper Jr.